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July 26, 2001

To: Dennis Fisher  
Bruce Goodwin  
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From: Michael R. Anastasio  
Deputy Director  
for Strategic Operations



Subject: Implementation of DOE Compensatory Measures for Existing Unreviewed Safety Question Procedures

- References:
1. Letter from M. Hooper to M. Anastasio dated June 26, 2001, Compensatory Measures for Existing Unreviewed Safety Question Procedures
  2. Letter from M. Hooper to M. Anastasio dated July 3, 2001, Extension of Time Period for Implementation of Compensatory Measures for the Existing Unreviewed Safety Question Procedures

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NNSA/OAK has not approved the LLNL Unreviewed Safety Question (USQ) procedures submitted on April 6, 2001. Therefore, LLNL nuclear facilities are to use existing procedures as modified by the DOE letters (References 1 and 2).

Based on a review of the existing LLNL USQ procedures and the identification of issues concerning the procedures, DOE requires LLNL to take specific compensatory measures. Reference 1 (Enclosure 1) requires that LLNL nuclear facilities, except B332, no longer use "applicability pre-screening" of the existing USQ guidance in the ES&H Manual (Part 51, 51.3) when performing USQ evaluations. DOE has specified in the letters guidelines in the application of the ES&H Manual provisions in 51.3 to clarify whether the LLNL USQ process applies or not. The guidance in Reference 1 has been modified by Reference 2 (Enclosure 2). These considerations have been summarized below to clarify what is required for evaluation of changes to nuclear facilities and associated procedures.

The guidance and compensatory measures will be in place by August 7, 2001, will be made a part of the LLNL ES&H Manual, and will remain in effect until NNSA/OAK approves revised USQ procedures and the new procedures are implemented.

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### A. Changes to be Considered when using this Guidance

Facilities must consider what constitutes a change. Changes to be considered are – any alteration or modification, temporary or permanent, to the facility configuration, facility documentation, design requirements, specification, facility software, procedures or processes, or introduction of new technology or the conduct of tests or experiments not described in the documented safety analysis.

### B. Changes Requiring DOE Review and Approval

In order to determine whether the USQ process is applicable to a proposed change, one of the first questions to ask is whether the proposed change is required to be submitted to DOE for approval. There are several conditions that require DOE review and approval. The following are examples of some changes that are considered changes to the facility safety basis that must be reviewed and approved by NNSA/OAK prior to implementation, but do NOT require the USQ process:

- A change that introduces a new technology to the facility,
- A change that is a major modification,
- Any change to a TSR, including editorial corrections, and
- A proposed change that LLNL management has decided will be submitted to NNSA/OAK for review and approval.

### C. Activities NOT Considered to be a Change Under the USQ Process

Consistent with the above definition, the following activities are not considered to be changes under the USQ process and therefore do NOT require entering the USQ process and do not require documentation of the review nor justification.

- Exact replacements (e.g., same manufacturer, same model number),
- Replacement of equipment with a part from the “Approved Equivalent Parts” list,
- A clearly inconsequential change to a procedure (i.e., spelling errors, typographical errors, additional notes or references) that does NOT involve a TSR change,
- Issues covered by a prior negative USQ screening or determination, or DOE-approved positive determination that are part of the facility’s approved safety basis, and
- Common commercial practices that do NOT have the potential to impact equipment important to safety.

#### D. Changes Requiring Implementation of the USQ Process

The following are considered to be changes to the facility safety basis and require the implementation of the USQ process.

- Establishment or modification of the facility's "Approved Equivalent Parts" list,
- Use of parts that are not exact replacements and not on the facility's "Approved Equivalent Parts" list,
- Restoration modifications for an "as-found" change, and
- Clarifications to the existing safety basis.

#### E. Other Compensatory Measures

Other compensatory measures that do not involve "applicability pre-screening" that must be implemented are:

1. The "Basic Screening" questions described in ES&H Manual, Volume V, Part 51, 51.3, *Unreviewed Safety Question Process*, must include at the end the words "either explicitly or implicitly." Therefore, the basic screening questions become:
  - a. Are planned temporary or permanent physical changes to the nuclear facility or the equipment described in the existing safety analysis (**either explicitly or implicitly**)?
  - b. Are planned temporary or permanent changes to procedures described in the existing safety analysis (**either explicitly or implicitly**)?
  - c. Does the activity involve new or modified tests, experiments, or operations that have not been previously evaluated **in the existing safety analysis**?  
[note – not adding "either explicitly or implicitly" to this item is different than as stated in the June 26, 2001 DOE letter, but it is consistent with Implementation Guide (DOE-G- 424.x-x). This modification has been discussed with DOE personnel.]

[changes are noted in bold]

2. Conditions have been specified in Item 6 of Reference 1 for B332.
3. Additional screening criteria are not allowed without prior DOE/OAK approval, except as documented in the Interim Onsite Transportation Safety Document (IOTSD).

This guidance has been discussed with the NNSA/OAK office. If you have any questions related to this memo or the enclosures, please contact Howard Wong (x35722) or [wong59@llnl.gov](mailto:wong59@llnl.gov).

Enclosures:

1. Letter M. Hooper to M. Anastasio, dated 6/26/01, Compensatory Measures for Existing Unreviewed Safety Question Procedures
2. Letter M. Hooper to M. Anastasio, dated 7/3/01, Extension of Time Period for Implementation of Compensatory Measures for the Existing Unreviewed Safety Question Procedures

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